UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
9311 GROH ROAD
GROSSE ILE, MI 48138

25 AUG 2011

MEMORANDUM

Subject: ACTION MEMORANDUM - Request for Approval of a Time-Critical Removal Action at the Durable Coatings Site, Northville, Wayne County, Michigan (Site ID # C521)

From: Jeffrey A. Lippert, On-Scene Coordinator (OSC)
Emergency Response Branch-1
Emergency Response Section-2

Through: Jason El-Zein, Chief
Emergency Response Branch-1

To: Richard C. Karl, Director
Superfund Division

I. PURPOSE

The purpose of this Action Memorandum is to request and document your approval to expend up to $599,731 to conduct a time-critical removal action at the Durable Coatings Site (Site), in Northville, Wayne County, Michigan. The time-critical removal action proposed herein is necessary to mitigate threats to public health, welfare, and the environment posed by the presence of uncontrolled hazardous substances at the Site. There are no nationally significant or precedent setting issues associated with the proposed response at this non-NPL site.

The Action Memorandum would serve as approval for expenditures by EPA, as the lead technical agency, to take actions described herein to abate the imminent and substantial endangerment posed by hazardous substances at the Site. The proposed removal of hazardous substances would be taken pursuant to Section 104(a)(1) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 USC 9604(a)(1), and Section 300.415 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR 300.415.

There are no nationally significant or precedent setting issues associated with the Site.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID: MIN000510557

RCRA ID: MIK579262676
State ID: 481316
Category: Time-critical

The Site contains a two-story building occupying a total of approximately 57,864 square feet and several concrete parking areas. Durable Coatings Corporation used the Site for electro-coating services, including rust-preventative coating, corrosion-resistant coating, and metal finishing services. The Site is no longer operational.

A. Site Description

1. Removal site evaluation

Michigan Department of Environmental Quality (MDEQ), formerly Michigan Department of Natural Resources and Environment, issued Durable Coatings a Violation Notice (VN) on December 1, 2010 related to the abandoned wastewaters, waste materials, and used and unused product materials. A subsequent VN was issued by MDEQ on January 31, 2011. On April 1, 2011, MDEQ sent a letter to U.S. EPA requesting a response action at the Site.

U.S. EPA met MDEQ on-site on May 19, 2011 to conduct a Site walk-through. U.S. EPA observed numerous drums, vats, totes, tanks, compressed gas cylinders, and other miscellaneous containers strewn throughout the Site. A large number of the containers were observed to be unlabeled and unsecured. One worker was on-site. The worker was wearing no personal protective equipment (PPE), had visual signs of waste on his hands and clothes, had no Occupational Safety and Health Administration (OSHA) hazardous waste training, and was smoking cigarettes. Multiple signs of spills were observed in the building including puddles and pools of liquid waste on the floor. The worker stated that he was preparing the waste for disposal and made mention of transferring contents of containers into other containers.

U.S. EPA conducted a site assessment on June 17, 2011 of Durable Coatings. U.S. EPA documented the presence of over 390 containers, including drums, vats, totes, tanks, compressed gas cylinders, and other miscellaneous containers. Labels on some containers indicated the potential presence of hydrochloric, acetic, nitric, sulfuric, and phosphoric acids, sodium hydroxide; potassium hydroxide; n-methylene chloride; dichloromethane; propane; oxygen; acetylene; glycol ether; and cellulose solvent.

2. Physical location

The Site is located at 16500-16580 Northville Road in Northville, Wayne County, Michigan 48168 in a mixed residential/commercial/industrial area. Coordinates for the Site are 42.3945 degrees north and -83.4681 degrees west. The Middle Rouge River is immediately south of the Site and is approximately 60 feet from the building. Several other water bodies are located within a one-mile radius of the Site, including Waterford Pond and Phoenix Lake. Meads Middle School is located approximately 750 feet to the northeast of the Site.

The area surrounding the Durable Coatings Site was screened for Environmental Justice (EJ) concerns using Region 5's EJ Assist Tool (which applies the interim version of the national EJ Strategic Enforcement Assessment Tool (EJSEAT)). Census tracts with a score of 1, 2, or 3 are considered to be high-priority potential EJ areas of concern

according to EPA Region 5. The Durable Coatings Site is in a census tract with a score of 3 (Attachment 3). Therefore, Region 5 considers this Site to be a high-priority potential EJ area of concern. Please refer to the attached analysis for additional information.

3. Site Characteristics

The Site consists of a 4.15-acre parcel bordered by Northville Road and Hines park to the west, commercial properties to the north and south, and railroad tracks and residential homes to the east. The Site is the former location of Durable Coatings and includes a building with an office area and a number of other additions totaling 57,864 square feet. Durable Coatings Corporation used the Site for electro-coating services, including rust-preventative coating, corrosion-resistant coating, and metal finishing services. The Site is no longer operational.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

The presence of hazardous substances existing at the Site has been documented. The Toxicity Characteristic Leaching Procedure (TCLP) results for a drum at the Site which contains methyl ethyl ketone (MEK) were 17,000 milligrams per liter (mg/L) which is 85 times above what is characteristically hazardous for MEK. This same drum has a flash point of 50 degrees Fahrenheit (^{o} F); 90^{o} F below what is characteristically hazardous. In addition, a corrosive substance in a drum at the Site had a pH of 14.0 standard units (S.U.) A drum marked as "hydrochloric acid" produced visible acid vapor fumes when opened. Fumes from this drum produced a pH of zero S.U. on field screening equipment. Both values of zero and 14.0 S.U. are considered characteristically hazardous. The building is unsecured, unwatched, and secluded. Access to the Site is unrestricted due to an unsecured perimeter fence. These facts make the building prone to trespassers who may both vandalize and burglarize the property causing either accidental or purposeful releases of the hazardous substances located there.

U.S. EPA quantified more than 390 different containers of uncontrolled liquid wastes on the property. Four waste liquid samples were collected yielding results that are characteristically hazardous based on ignitability, corrosivity, and toxicity characteristics as defined by 40 C.F.R. §261.21, §261.22, and §261.24, respectively. Labels on some containers indicated the potential presence of hydrochloric, acetic, nitric, sulfuric, and phosphoric acids, sodium hydroxide; potassium hydroxide; n-methylene chloride; dichloromethane; propane; oxygen; acetylene; glycol ether; and cellulose solvent. All of these substances are hazardous substances as defined by 40 C.F.R. §302.4, except for oxygen, acetylene, and cellulose solvent.

A waste liquid sample collected from a drum yielded laboratory TCLP results for methyl ethyl ketone of 17,000 mg/L. This result exceeds the toxicity criterion of 200 mg/L. Therefore, the waste associated with this sample is considered hazardous according to 40 C.F.R. §261.24. The laboratory result for flashpoint of the same sample was 50^{o} F. This result is below 140^{o} F. Making the waste associated with this sample also hazardous by the characteristic of ignitability as defined by 40 C.F.R. §261.21.

Another waste liquid sample collected from a drum on-site yielded laboratory results for flashpoint of 115^{o} F. This value is also below 140^{o} F, making the waste associated with this sample characteristically hazardous by the characteristic of ignitability as defined by 40 C.F.R. §261.21.

The pH of yet another waste liquid sample collected from an on-site drum yielded laboratory results of 14 S.U. This value is greater than 12.5, the value deemed characteristically hazardous by the characteristic of corrosivity by 40 C.F.R. §261.22.

A drum marked as hydrochloric acid produced strong vapors when opened by U.S. EPA. A sample was not collected from this drum due to its fuming nature. Field screening pH paper was placed into the fumes emanating from the opened drum and produced results of zero S.U.

The Site building is in a state of disrepair. Numerous holes in the roof and walls of the building allow precipitation to enter. This precipitation will lead to the further degradation of Site containers and contribute to the likelihood of release. Similarly, gas service has been cut-off to the building and no heat is available. Freezing of the chemicals on-site can lead to expansion and bulging of the containers and increase the likelihood of release. Lastly, the building currently sits vacant and perimeter fencing is incomplete which can lead to trespassers. Trespassers have the potential to cause an accidental or purposeful release to the environment. The Middle Rouge River lies approximately 60 feet from the building.

5. NPL status

The Site is not on the National Priorities List (NPL), nor is it reasonably expected to be proposed for the NPL.

6. Maps, pictures and other graphic representations

A figure detailing the location of the Site is included in the attached Site Location Map (Figure A-1). A figure detailing site features such as building footprint, site boundaries, and river location is presented in the attached Site Features Map (Figure A-2). Attachment III details the Environmental Justice analysis for the Site.

B. Other Actions to Date

1. Previous actions

A previous attempt at a cleanup action was initiated the by potentially responsible party with one untrained and unqualified worker. During a Site visit with MDEQ, U.S. EPA observed the worker wearing no PPE, signs of liquid waste on his hands and clothes, and smoking cigarettes. When questioned, the worker stated that he had been transferring contents of containers into other containers and that he had no OSHA hazardous waste training. Multiple signs of spills were observed in the building including puddles and pools of liquid waste on the floor.

2. Current actions

Not Applicable.

C. State and Local Authorities' Roles

1. State and local actions to date

Ypsilanti Community Utilities Authority (YCUA) issued Durable Coatings a Cease and Desist Order on July 7, 2010 disallowing discharging of process pretreatment wastewaters into the municipal sanitary sewer system.

MDEQ issued Durable Coatings a Violation Notice (VN) on December 1, 2010 related to the abandoned wastewaters, waste materials, and used and unused product materials. A subsequent VN was issued by MDEQ on January 31, 2011. On April 1, 2011, MDEQ sent a letter to U.S. EPA requesting a response action at the Site.

2. Potential for continued state/local response

MDEQ requested U.S. EPA assistance at the Site on April 1, 2011 in dealing with the potentially hazardous wastes located within the building. State and local government assistance will be required during the removal action for those governmental functions that are inherently state and local.

III. THREATS TO PUBLIC HEALTH, WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions at the Site present an imminent and substantial threat to the public health, or welfare, and the environment and meet the criteria for a time-critical removal action as provided for in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), as amended, 40 C.F.R . §300.415(b)(2). These criteria include, but are not limited to, the following:

1. Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.

Laboratory analytical and field screening results indicate that the material in drums, vats, totes, tanks, compressed gas cylinders, and other miscellaneous containers is hazardous and/or potentially hazardous. Liquid samples were collected for laboratory analysis from drums at the Site. The sampling locations were based on field screening results and visual observations.

The analytical results from three liquid samples indicated that the material is characterized as hazardous waste by corrosivity, toxicity, and ignitability as defined in 40 C.F.R. §§ 261.21, 261.22 and 261.24. Corrosive wastes are considered characteristic hazardous wastes if they have a pH less than 2 or greater than 12.5 S.U. Analytical results showed that a sample collected from a 55-gallon drum labeled "sodium hydroxide" had a pH of 14.0 S.U. A 55-gallon drum marked as "hydrochloric acid" produced visible acid vapor fumes when opened. Fumes from this drum produced a pH of zero S.U. on field screening equipment.

Laboratory analytical results for another 55-gallon drum yielded TCLP results of 17, 000 mg/L for MEK. Levels of MEK are considered characteristically toxic if they are above 200 mg/L as defined in 40 C.F.R. § 261.24. The liquid in this drum is 85 times higher than what is characteristically toxic. According to ATSDR, breathing MEK can result in irritation of the nose, throat, skin, and eyes.

Other potential chemical hazards on Site include:

- Over 200 miscellaneous containers containing unknown liquids;
- A waste water treatment system with numerous settling tanks containing liquid and sludge;
- Eighteen 275-gallon totes containing unknown liquids; and
- Nineteen above-ground storage tanks containing unknown liquids.

Access to the property is unrestricted. The Site is partially fenced; however, access is unrestricted at the east, west and south sides of the property. Residential housing is located approximately 750 feet to the south and east of the Site. Meads Mill Middle School is located approximately 750 to the northeast of the Site. The presence of residential homes and a school so close to the Site increases the likelihood of exposure to residents of a release.

Some wastes on Site are not properly containerized nor properly labeled. None of the hazardous waste or potentially hazardous material containers have secondary containment. A number of the containers documented at the Site are deteriorated, corroded, and/or bulging. Potential releases of hazardous waste from the Site could, in addition to directly affecting nearby populations, also migrate off-site. Due to on-site waste storage conditions and the potential for trespassers, hazardous waste on-site could be released. Potential exposure through each of these migration pathways could cause imminent endangerment to human health, welfare, or the environment.

2. Actual or potential contamination of drinking water supplies or sensitive ecosystems.

Drums, vats, totes, tanks, compressed gas cylinders, and other miscellaneous containers containing hazardous wastes or potentially hazardous materials inside the main building could become compromised and secondary containment is not present. Intentional or accidental releases of hazardous waste from the Site could enter the Middle Branch of the Rouge River which is approximately 60 feet from the building. Storm water drains are reported to drain directly to the Middle Branch of the Rouge River. A release to this water body would contaminate other nearby surface water bodies, and potentially affect drinking water supplies and sensitive ecosystems.

3. Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.

Several drums, vats, totes, tanks, compressed gas cylinders, and other miscellaneous containers house hazardous waste or potentially hazardous chemicals, including strong acids, ignitable liquids, and at least one waste liquid with hazardous concentrations of MEK. Many of the drums were in poor condition, open, corroded and/or bulging. As described above, three liquid samples from Site drums were identified as characteristically hazardous wastes. The building is unsecure and unwatched and has a likelihood of being broken into and vandalized by trespassers. Weathering and activity of trespassers could cause containers on-site to breach and the contents of the containers could thereby be released into the environment.

4. Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.

Southeastern Michigan summers and winters result in vaporization and freeze-thaw cycles. These weather conditions could cause the subsequent breach of containment and the release of chemicals at the Site. Currently, the building has no heat as the gas service was cut-off. It is exposed to adverse weather conditions such as high winds, rain, sleet, and snow. There are also numerous holes in the roof where precipitation is entering the building. Severe weather conditions have and will continue to contribute to the deterioration of the building and the containers and drums stored there, creating the potential for additional releases and/or migration of hazardous substances.

5. Threat of fire or explosion.

The threat of fire or explosion exists due to the presence of ignitable and combustible liquids in containers. Two liquid samples collected had flash points below 140° F, which is considered characteristically hazardous as defined at 40 C.F.R. § 261.21. One of the ignitable liquids has a flash point of 50° F. Summer temperatures in Michigan can easily reach above 90° F, which could result in the presence of flammable vapors. The building is unwatched, which could lead to potential trespassing and vandalism. As temperatures decrease in autumn and winter, the potential increases for vagrants to enter the buildings and start fires for warmth. A fire could produce toxic gases, irritants, hazardous smoke, and contaminated fire suppression water runoff.

6. The availability of other appropriate federal or state response mechanisms to respond to the release.

The MDEQ requested U.S. EPA's assistance with a Site Assessment and Time-Critical Removal at the Site due to historical usage as a metal coating facility. Drums, vats, totes, tanks, compressed gas cylinders, and other miscellaneous containers at the Site were also documented by MDEQ. This request documents the need for federal involvement to address imminent endangerment posed by the Site.

IV. ENDANGERMENT DETERMINATION

Given the Site conditions, the nature of the known and suspected hazardous substances on Site, and the potential exposure pathways described in Sections II and III, actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The response actions described in this memorandum directly address actual or potential releases of hazardous substances at the Site, which may pose an imminent and substantial endangerment to public health, or welfare, or the environment. Removal activities on-site will include:

a) Develop and implement a site-specific Health and Safety Plan, including an Air Monitoring Plan, and a Site Emergency Contingency Plan;

b) Develop and implement a Site Work Plan and Site Security Plan;

c) Inventory, perform hazard characterization, and sample all suspected hazardous substances contained or uncontained in compliance with a site-specific QA/QC Plan;

d) Address other contaminated media in accordance with Applicable, Appropriate, and Relevant Requirements to the extent practicable;

e) Consolidate, package, hazardous substances, pollutants and contaminants for transportation and off-site disposal;

f) Dismantle and/or decontaminate contaminated structures as necessary;

g) Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants that pose a substantial threat of release at a RCRA/CERCLA-approved disposal facility in accordance with U.S. EPA's Off-Site Rule (40 C.F.R. § 300.440).

The response action proposed herein will mitigate the threats at the Site by properly identifying, consolidating, and packaging hazardous materials, pollutants, and contaminants on-site. The consolidated materials will be removed and ultimately disposed off-site. Additional Site activities will include security, perimeter air monitoring, and decontamination of the building on the Site, as needed to complete the removal action.

This response action will be conducted in accordance with Section 104(a)(1) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9604(a)(1) and Section 300.415 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR 300.415, to abate or eliminate the immediate threat posed to public health and/or the environment by the presence of the hazardous substances. The hazardous substances at the Site are expected to be removed as a result of the proposed removal action. No uncontrolled hazardous substances are expected to remain at the Site once the removal action is completed.

The removal action will be conducted in a manner not inconsistent with the NCP. The OSC has initiated planning for provision of post-removal Site control consistent with the provisions of Section 300.415(l) of the NCP. Elimination of all threats presented by hazardous substances at the Site, however, is expected to minimize the need for post-removal Site control.

All hazardous substances, pollutants or contaminants removed off-site pursuant to this removal action for treatment, storage and disposal shall be treated, stored, or disposed at a facility in compliance, as determined by U.S. EPA, with the U.S. EPA Off-Site Rule, 40 C.F.R. § 300.440.

2. Contribution to remedial performance

The proposed action will not impede future actions based on available information. The proposed actions will, to the extent practicable, contribute to the efficient performance of any long-term remedial action with respect to the release or threatened release concerned. No further action is anticipated once the proposed removal action is completed.

3. Engineering Evaluation/Cost Analysis (EE/CA)

Not Applicable.

4. Applicable or relevant and appropriate requirements (ARARs)

All identified applicable or relevant and appropriate requirements (ARARs) of Federal and state law will be complied with to the extent practicable considering the exigencies of the situation. The OSC sent a letter dated June 28, 2011, requesting ARARs to Mr. Paul Owens, MDEQ, Warren Office.

Federal

Federal ARARs for this Site primarily include, but are not limited to: 40 C.F.R. §101 (14), §121 (d)(3), §262.11, §300.440, and §300.415 (2).

State

To date, U.S. EPA has not received an ARAR response from MDEQ.

5. Project schedule

The proposed activities listed in Section V of this memorandum will require an estimated 60 on-site working days to complete.

6. Estimated costs

REMOVAL ACTION PROJECT CEILING ESTIMATE		
Extramural Costs:		
Regional Removal Allowance Costs:		
Total Cleanup Contractor Allowance Costs	$	425,649
Other Extramural Costs Not Funded from the Regional Allowance:		
Total START, including multiplier costs	$	95,856
Subtotal	$	521,505
Subtotal Extramural Costs	$	521,505
Extramural Costs Contingency (15% of Subtotal Extramural Costs)	$	78,226
TOTAL REMOVAL ACTION PROJECT CEILING	$	599,731

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Given the Site conditions, the nature of the hazardous substances and pollutants or contaminants documented on-site, and the potential exposure pathways to nearby populations described in Sections II, III, and IV above, actual or threatened release of hazardous substances and pollutants or contaminants from the Site, failing to take or delaying action may present an imminent and substantial endangerment to public health, welfare or the environment, increasing the potential that hazardous substances will be released, thereby threatening the adjacent population and the environment.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

($599,731 + $159,380) + (62.76% x $759,111) = $1,235,529

The total EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be $1,235,529[1].

[1] Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Durable Coatings Site in Northville, Wayne County, Michigan. This document has been developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the Site, see Attachment II. Conditions at the Site meet the NCP § 300.415(b)(2) criteria for a time-critical removal action and I recommend your approval.

The total removal project ceiling, if approved, will be $599,731. Of this, an estimated $503,875 may be used for the cleanup contractor costs. You may indicate your decision by signing below.

APPROVE: Richard C Karl DATE: 8-25-11
Director, Superfund Division

DISAPPROVE: _____ DATE: _____
Director, Superfund Division

Enforcement Addendum

Figures:

A-1; Site Location Map
A-2: Site Features Map

Attachments:

I. Detailed Cleanup Contractor Cost Estimate
II. Administrative Record Index
III. Region 5 EJ Analysis
IV. Independent Government Cost Estimate

cc: Sherry Fielding, U.S. EPA, 5104A
fielding.sherry@epa.gov
Michael Chezik, U.S. Department of the Interior, w/o Enf. Addendum
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Bill Schuette, Michigan Attorney General, w/o Enf. Addendum
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FIGURE A-1

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

SITE LOCATION MAP
FOR
DURABLE COATINGS SITE
NORTHVILLE, WAYNE COUNTY, MICHIGAN

July 2011

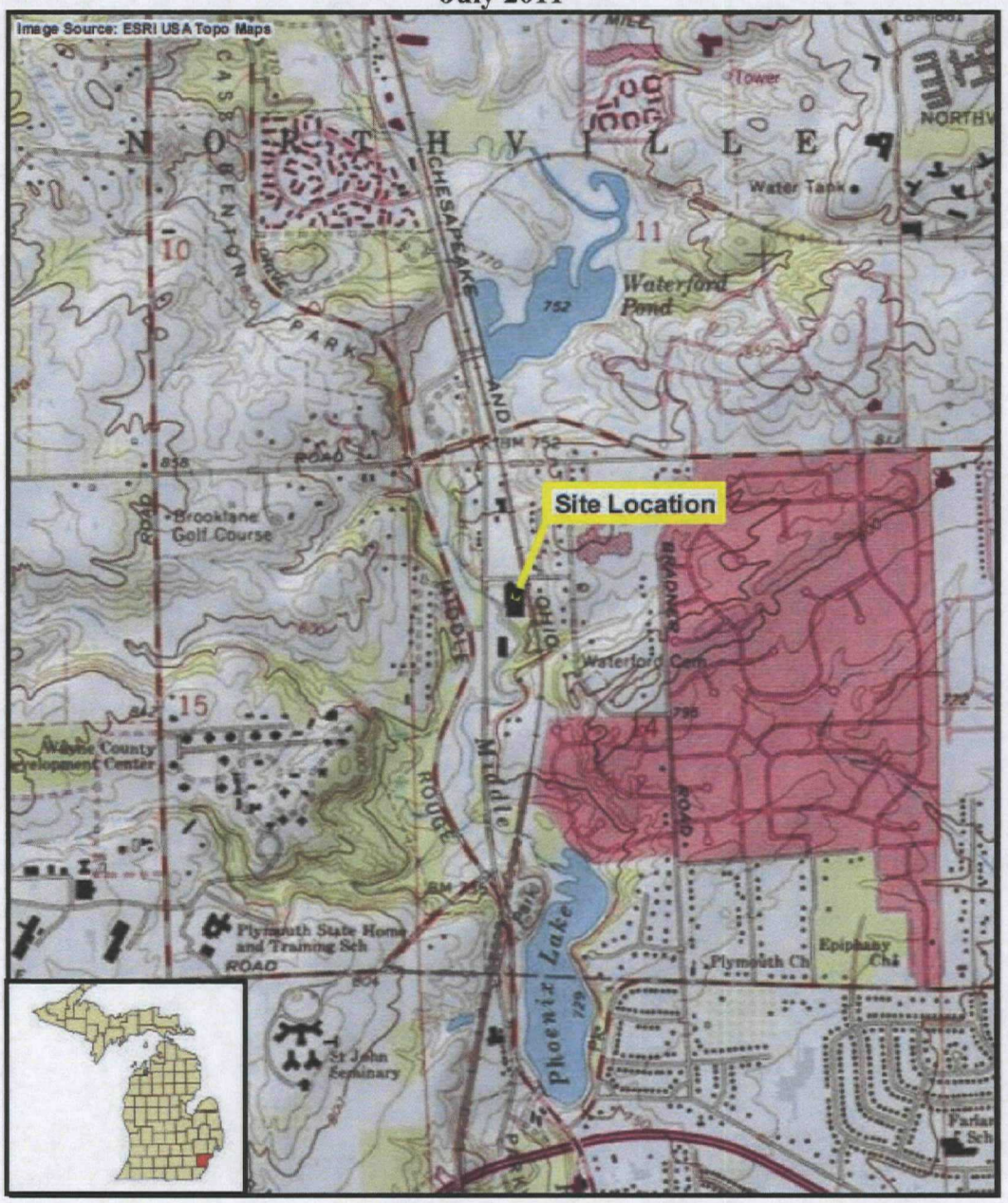


FIGURE A-2

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

SITE FEATURES MAP
FOR
DURABLE COATINGS SITE
NORTHVILLE, WAYNE COUNTY, MICHIGAN

July 2011

ENFORCEMENT ADDENDUM

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

DURABLE COATINGS SITE
NORTHVILLE, WAYNE COUNTY, MICHIGAN

JULY 2011

ENFORCEMENT CONFIDENTIAL
NOT SUBJECT TO DISCOVERY

(REDACTED 2 PAGES)

ATTACHMENT 1

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

DETAILED CLEANUP CONTRACTOR COST ESTIMATE

DURABLE COATINGS SITE
NORTHVILLE, WAYNE COUNTY, MICHIGAN

JULY 2011

(REDACTED 1 PAGE)

ATTACHMENT 2

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

ADMINISTRATIVE RECORD
FOR
DURABLE COATINGS SITE
NORTHVILLE, WAYNE COUNTY, MICHIGAN

July 2011

NO.	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
1	09/00/95	ATSDR	File	ATSDR Tox FAQs Sheet for 2-Butanone, CAS #78-93-3	2
2	04/00/02	ATSDR	File	ATSDR Tox FAQs Sheet for Sodium Hydroxide CAS #1310-73-2	2
4	07/07/10	Thomas, P., Ypsilanti Community Utilities Authority	Michrina, R., Durable Coatings	Cease and Desist Order for Durable Coatings Corp.	10
5	12/01/10	Day, J., MDEQ	Michrina, R., Durable Coatings	Violation Notice for Durable Coatings Corp.	7
6	01/31/11	Day, J., MDEQ	Michrina, R., Durable Coatings	Violation Notice for Durable Coatings Corp.	7
3	01/17/11	Favor, M., The Environmental Quality Company	Anderson, H., Durable Coatings	Letter re: Cleanout of Abandoned Materials	4
4	04/01/11	Verona, L., MDEQ	Lippert, J., U.S. EPA	Letter re: Request for U.S. EPA Response Action; Durable Coatings Corp.	3
5	06/28/11	Lippert, J., U.S. EPA	Owens, P., MDEQ	Letter re: U.S. EPA Request for MDEQ Identify all ARARs for the Durable Coatings Site	1
6	07/11/11	Clark, A., Weston Solutions	Lippert, J., U.S. EPA	Site Assessment Report for the Durable Coatings Site	61

7	00/00/00	Lippert, J., U.S. EPA	Karl, R., U.S. EPA	Action Memorandum: Durable Coatings Site **(PENDING)**

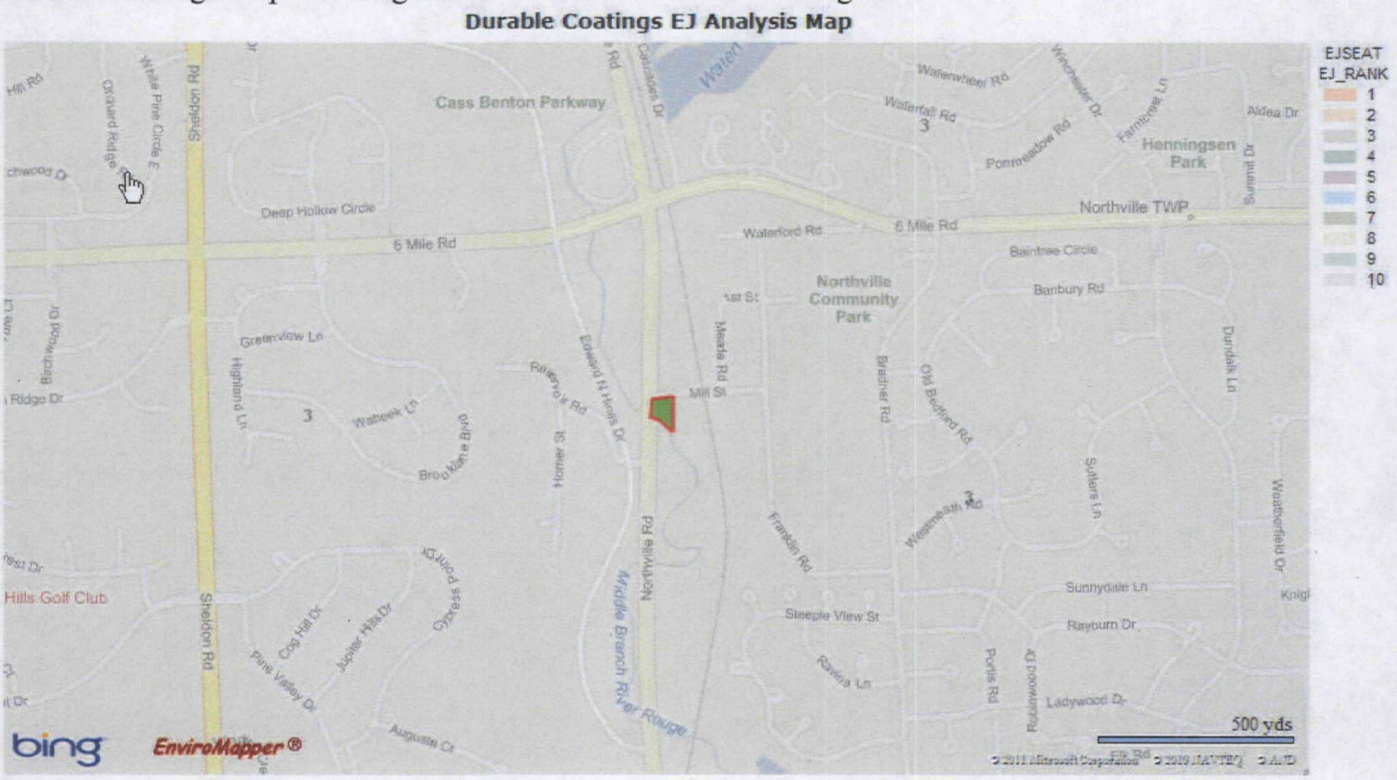
ATTACHMENT 3

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

REGION 5 SUPERFUND ENVIRONMENTAL JUSTICE ANALYSIS
FOR
DURABLE COATINGS SITE
NORTHVILLE, WAYNE COUNTY, MICHIGAN

ORIGINAL
July 2011

Durable Coatings Map Showing EJ SEAT Values For Surrounding Area



ATTACHMENT 4

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

INDEPENDENT GOVERNMENT COST ESTIMATE
FOR
DURABLE COATINGS SITE
NORTHVILLE, WAYNE COUNTY, MICHIGAN

JULY 2011

(REDACTED 2 PAGES)